

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**NOTICE OF DEFENDANTS JOHNSON & JOHNSON AND LLT  
MANAGEMENT, LLC'S NOTICE OF OBJECTIONS TO SPECIAL  
MASTER ORDER NO. 25 (ADDRESSING THREE MOTIONS TO  
QUASH AND/OR FOR PROTECTIVE ORDER) (ECF NO. 32926)**

**PLEASE TAKE NOTICE** that on August 19, 2024, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC's ("Defendants") Objections to the July 9, 2024 Special Master Order No. 25 (Addressing Three Motions to Quash and/or for Protective Order) (ECF No. 32926) before this Court. For the reasons explained in the Objection filed herewith, Defendants will ask for an order (1) vacating Special Master Order No. 25 (ECF No. 32926), and (2) denying the Plaintiff Steering Committee's, Beasley Allen's, and the Smith Law Firm's motions to quash and/or for protective order (ECF Nos. 32445, 32483, 32603).

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Objection submitted herewith, the Declaration of

Matthew L. Bush, Esq., together with exhibits, and any reply submissions made hereafter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE THAT** oral argument is requested.

Dated: July 21, 2024

Respectfully submitted,

*/s/ Kristen R. Fournier*

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Johnson and LLT Management, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2024, I electronically filed the foregoing document with the clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Kristen R. Fournier

Kristen R. Fournier